

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
JULIO FIGUEROA	:	VIOLATIONS:
RAUL ROQUE	:	
ANTHONY CORREA	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a "Anthony Colon"	:	and possess with intent to distribute 5
CORY LABLOUNT	:	kilograms or more of cocaine - 1 count)
a/k/a "Tyreek Blank"	:	21 U.S.C. § 856 (a)(1) (unlawfully
	:	maintaining a place for the manufacture of
	:	controlled substances - 1 count)
	:	21 U.S.C. § 841 (a)(1) (distribution of
	:	cocaine - 3 counts)
	:	21 U.S.C. § 841 (a)(1) (possession with
	:	intent to distribute cocaine - 3 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	21 U.S.C. § 853 (notice of forfeiture)
	:	Notice of prior convictions
	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or around November 5, 2003, to on or about November 6, 2003,
at Philadelphia, in the Eastern District of Pennsylvania, defendants

JULIO FIGUEROA
RAUL ROQUE
ANTHONY CORREA,
a/k/a "Anthony Colon," and
CORY LABLOUNT
a/k/a "Tyreek Blank"

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute, and possess with intent to distribute, 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(A).

MANNER AND MEANS

2. It was part of the conspiracy that defendant JULIO FIGUEROA operated a cocaine packaging and distribution operation from 2643 Mascher Street, Philadelphia, Pennsylvania, where FIGUEROA distributed multi-hundred gram to multi-kilogram quantities of cocaine to co-conspirators, including defendants ANTHONY CORREA, a/k/a “Anthony Colon,” and CORY LABLOUNT, a/k/a “Tyreek Blank,” and others unknown to the grand jury.

It was a further part of the conspiracy that:

3. Defendant RAUL ROQUE supplied defendant JULIO FIGUEROA with kilogram quantities of cocaine at a cost of between \$25,000 and \$27,000 per kilogram.

4. Defendant JULIO FIGUEROA used the premises at 2643 Mascher Street as a place to receive, “re-rock,” package and distribute cocaine supplied by cocaine suppliers including defendant RAUL ROQUE.

5. Defendant JULIO FIGUEROA paid defendant RAUL ROQUE approximately \$25,000 to \$27,000 per kilogram for each kilogram of cocaine ROQUE delivered to FIGUEROA, cocaine which was intended for further distribution and sale at the premises at 2643 Mascher Street, in Philadelphia.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania:

1. On or about November 5, 2003, defendant JULIO FIGUEROA, while counting large sums of United States currency inside the premises at 2643 Mascher Street, in Philadelphia, told a cooperating witness that he expected to receive 30-40 kilograms of cocaine the same day.

2. On or about November 5, 2003, defendant JULIO FIGUEROA told a cooperating witness that he wanted the individual to accompany him to pick up a kilogram of cocaine for delivery to a black male.

3. On or about November 5, 2003, defendant JULIO FIGUEROA, while counting more than \$100,000 in United States currency inside the premises at 2643 Mascher Street in Philadelphia, told a cooperating witness that he was getting the money ready to pay his “guy” (cocaine supplier).

4. On or about November 5, 2003, defendant JULIO FIGUEROA caused to be delivered to defendant RAUL ROQUE a large bag containing approximately \$107,000 in United States currency, representing payment for the delivery of kilogram quantities of cocaine.

5. On or about November 5, 2003, defendant JULIO FIGUEROA distributed approximately 115 grams of cocaine to a cooperating individual inside the premises at 2643 Mascher Street, in return for a cash payment of \$3,000.

6. On or about November 5, 2003, defendant JULIO FIGUEROA distributed approximately 874 grams of cocaine to defendant ANTHONY CORREA, a/k/a “Anthony Colon,” inside the premises at 2643 Mascher Street.

7. On or about November 5, 2003, defendant ANTHONY CORREA, a/k/a “Anthony

Colon,” possessed with intent to distribute approximately 874 grams of cocaine inside a Chevrolet Lumina, Pennsylvania license # FJW-5894.

8. On or about November 5, 2003, defendant JULIO FIGUEROA possessed approximately three kilograms of cocaine, together with approximately \$25,089 in United States currency, inside the trunk of a black Toyota Maxima, Pennsylvania license # EZT-0040.

9. On or about November 5, 2003, defendant JULIO FIGUEROA distributed approximately 1,085.2 grams of cocaine to defendant CORY LABLOUNT, a/k/a “Tyreek Blank,” inside the premises at 2643 Mascher Street.

10. On or about November 5, 2003, defendant CORY LABLOUNT, a/k/a “Tyreek Blank,” possessed with intent to distribute approximately 1,085.2 grams of cocaine inside a maroon Chevrolet Impala, Pennsylvania license # FDW-1139.

11. On or about November 5, 2003, defendant JULIO FIGUEROA possessed inside the premises at 2643 Mascher Street, in Philadelphia multiple items of drug trafficking paraphernalia, including one steel cocaine press with two hydraulic two-ton capacity jacks, two electric heat sealers, three rolls of plastic wrap, plastic baggies, money wraps, one Proctor Silex grinder, multiple containers of cutting agents, three digital scales and one triple beam scale.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2003, at 2643 Mascher Street, Philadelphia, in the Eastern District of Pennsylvania, defendant

JULIO FIGUEROA

knowingly opened and maintained a place, that is, the residential dwelling located at 2643 Mascher Street, Philadelphia, Pennsylvania, for the purpose of manufacturing, repackaging and distributing cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JULIO FIGUEROA

knowingly and intentionally distributed, and aided, abetted and caused the distribution of, approximately 115 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JULIO FIGUEROA

knowingly and intentionally distributed, and aided, abetted and caused the distribution of, more than 500 grams, that is, approximately 874 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JULIO FIGUEROA

knowingly and intentionally distributed, and aided, abetted and caused the distribution of, more than 500 grams, that is, approximately 1,085.2 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

ANTHONY CORREA,
a/k/a “Anthony Colon,”

knowingly and intentionally possessed with intent to distribute, and aided, abetted and caused the possession of, with intent to distribute, more than 500 grams, that is, approximately 874 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

CORY LABLOUNT,
a/k/a "Tyreek Blank,"

knowingly and intentionally possessed with intent to distribute, and aided, abetted and caused the
possession of, with intent to distribute, more than 500 grams, that is, approximately 1,085.2
grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II
controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and
Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JULIO FIGUEROA

knowingly and intentionally possessed with intent to distribute, and aided, abetted and caused the possession of, with intent to distribute, more than 500 grams, that is, approximately 3,003 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

NOTICE OF PRIOR CONVICTION

Defendant JULIO FIGUEROA committed the offenses charged in Counts One, Two, Three, Four, Five and Eight of this indictment after having been convicted in the United States District Court for the Eastern District of Pennsylvania of the following felony drug offenses:

1. Conspiracy to distribute 500 or more grams of cocaine and distribution of 500 or more grams of cocaine at Indictment Number 94-321-02, for which he was sentenced to a term of imprisonment of 72 months to be followed by 5 years supervised release.
2. Distribution of cocaine (two counts) at Indictment Number 97-94-01, for which he was sentenced to a term of imprisonment of 12 months to be followed by 4 years supervised release.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1) set forth in this indictment, the defendants

JULIO FIGUEROA
RAUL ROQUE
ANTHONY CORREA,
a/k/a "Anthony Colon,"
CORY LABLOUNT
a/k/a "Tyreek Blank,"

shall forfeit to the United States of America:

(a) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation of Title 21, United States Code, as charged in this indictment;

(b) Any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violations of Title 21, United States Code, as charged in this indictment, such property to include but not be limited to: 1) the sum of \$500,000 in United States currency; and 2) the sum of \$107,000 in United States currency seized from defendant RAUL ROQUE on November 5, 2003; 3) the sum of approximately \$25,089 in United States currency seized from defendant JULIO FIGUEROA on November 5, 2003; 4) the sum of \$1,413 seized from defendant CORY LABLOUNT on November 5, 2003; and the sum of \$369 seized from defendant ANTHONY CORREA on November 5, 2003..

2. If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney